

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON**

In Re:

RICKIE BEAVERS, SR. & MELODY REGINA
BEAVERS,

Debtors.

**DECLARATION OF PLAINTIFF IN
SUPPORT OF DEFAULT JUDGMENT**

RICKIE BEAVERS, SR. & MELODY REGINA
BEAVERS,

Bankruptcy No. 12-13824-CMA

Plaintiffs,

Adversary No. 19-01109-CMA

v.

RBS CITIZENS

Defendant.

We, Rickie Beavers, Sr. & Melody Regina Beavers, under the penalty of perjury, hereby declare:

1. We are the Plaintiffs in the above-named action.
2. We are the owners of a parcel of real estate located at 12015 Renton Avenue S, Seattle, WA 98178.

Declaration - 1 of 2

ADVANTAGE LEGAL GROUP
12207 NE 8th Street
Bellevue WA 98005

- 1 3. We filed a Chapter 13 Bankruptcy case on April 13, 2012. We filed an adversary
2 proceeding on August 28, 2019 to avoid the second deed of trust held by RBS Citizens,
3 NA.
- 4 4. On the date of filing, the value of our home was \$132,000.00 per the www.zillow.com's
5 estimated value of the home.
- 6
- 7 5. The senior lienholder, Chase holds the first deed of trust, which was approximately
8 \$196,405.00 on the date of filing. This amount is greater than what our home is worth.
- 9
- 10 6. RBS Citizens, NA holds the second deed of trust on our property. On the date of filing, the
11 amount of the second deed of trust was approximately \$24,877.00.

12 Signed under the penalty of perjury in Seattle, Washington on October 2, 2019.

13 /s/Rickie Beavers, Sr.
14 Rickie Beavers, Sr.

15
16 /s/Melody Regina Beavers
17 Melody Regina Beavers